



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

July 15, 2015

Mr. Christopher L. Rimkus  
Managing Counsel for MarkWest Energy Partners, L.P.  
1515 Arapahoe Street, Tower 1  
Suite 1600  
Denver, CO 80202

**Re: Sarsen Gas Processing Plant - MarkWest Liberty Bluestone, LLC  
EPA Docket No. CAA-03-2015-0007**

Dear Mr. Rimkus,

On July 25, 2012, EPA conducted an air compliance evaluation of MarkWest Liberty Bluestone, LLC's ("MarkWest Liberty Bluestone") Sarsen Gas Processing Plant, located at 774 Prospect Road, Evans City, Pennsylvania 16033 (the "Facility"). Subsequent to this inspection, EPA issued a request for information pursuant to Section 114 of the Clean Air Act ("CAA"), 42 U.S.C. § 7414, and MarkWest Liberty Bluestone has provided responses to that request. The July 2012 inspection and the subsequent request for information are part of an on-going EPA Region III CAA compliance investigation by EPA Region III's Air Protection Division. This is a Notice of Noncompliance and Show Cause Notification relating to the above described on-going CAA compliance investigation.

Based upon EPA's review of information relating to the Facility's CAA compliance, EPA believes that the Facility failed to comply with certain federally enforceable requirements applicable to the Facility. A summary of alleged CAA noncompliance is enclosed herein. See Enclosure A ("General Summary of Allegations of Noncompliance with the Clean Air Act"). EPA is interested in discussing the areas of noncompliance summarized in Enclosure A with MarkWest Liberty Bluestone representatives.

**REQUEST FOR INFORMATION & OPPORTUNITY TO CONFER**

In order to initiate discussions regarding this matter, EPA is requesting the opportunity to confer with you and other representatives of the Facility. The purposes of such discussion would be to: 1) discuss any additional information that MarkWest Liberty Bluestone representatives may have demonstrating that EPA's summary of alleged noncompliance set forth in Enclosure A is incorrect; and 2) provide any additional information relevant to EPA's determination of whether EPA, Region III should consider any potential enforcement action relating to the summary of noncompliance allegations set forth in Enclosure A.

In order to expedite discussion of this matter, EPA is requesting a timely response to this letter and submission of any additional information demonstrating that EPA's summary of alleged noncompliance set forth in Enclosure A is not correct. Therefore, EPA is requesting that MarkWest Liberty Bluestone representatives respond to this letter within fifteen (15) business days of your receipt of this letter. If MarkWest Liberty Bluestone representatives do not respond within fifteen (15) business days of receipt of this letter, the Agency may determine an appropriate enforcement response without further prior notice to you.

Please send any and all information responsive to the above request, and direct any request for a settlement conference, to the attention of:

Candace Headen  
Assistant Regional Counsel  
Office of Regional Counsel (3RC10)  
U.S. EPA, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029  
Phone: 215-814-2632  
Email: Headen.Candace@epa.gov

We look forward to discussing this matter further with MarkWest Liberty Bluestone representatives. If you have any questions regarding anything in this letter, please contact Candace Headen at your earliest convenience at (215) 814-2632 or at Headen.Candace@epa.gov.

Sincerely,



Zelma Maldonado, Associate Director  
Office of Air Enforcement & Compliance Assistance  
Air Protection Division

Enclosure

cc: Bowen (Chip) Hosford, Environmental Scientist (3AP20)  
Candace Headen, Assistant Regional Counsel (3RC10)  
Donna L. Mastro, Air Branch Chief, EPA ORC (3RC10)

## GENERAL SUMMARY OF ALLEGATIONS OF NONCOMPLIANCE WITH THE CLEAN AIR ACT

The following allegations are regarding 40 C.F.R. Part 60, Subpart KKK: Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984 and on or Before August 23, 2011, and 40 C.F.R. Part 60, Subpart VV: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006, as referenced by 40 C.F.R. § 60.632(a) and (e).

1. Failure to Conduct Leak Detection and Repair ("LDAR") Monitoring:
  - a. From July 2011 until August 2011, MarkWest Liberty Bluestone failed to monitor pumps on a monthly basis in accordance with the methods specified in 40 C.F.R. § 60.485(b). Such monitoring is required by 40 C.F.R. § 60.482-2(a)(1), as referenced in 40 C.F.R. § 60.632(a).
  - b. MarkWest Liberty Bluestone failed to monitor three pressure relief valves in accordance with the methods specified in 40 C.F.R. § 60.485(c) to ensure operation with no detectable emissions, which is required by 40 C.F.R. § 60.482-4(a), as referenced in 40 C.F.R. § 60.632(a).
  - c. MarkWest Liberty Bluestone failed to monitor twenty-one valves on a monthly basis in accordance with the methods specified in 40 C.F.R. § 60.485(b), which is required by 40 C.F.R. § 60.482-7(a)(1), as referenced by 40 C.F.R. § 60.632(a).
  - d. MarkWest Liberty Bluestone failed to keep an accurate log of LDAR monitoring, which is required by 40 C.F.R. § 60.486(e), as referenced in 40 C.F.R. § 60.632(e). Inaccuracies include the following (for tag numbers including, but not limited to 28, 226, 418, 420, 422, 424, 456, 473, 474, 475, 475.1 480, 481, 483, 483.1 484, 485, 487, 488, 489, 490, 491, 493, 499, 503, 500, 507, 513, 519, 524, 525, 547, 592, 643, 644, 645, 656, 696, 703, 704, 707, 713, 715, 735, 751, 790, 801, 823, 1029, 1288, 1338, 1383, 1389, 1398, 1507, 1550, 1551, 1552, 1553, 1649, 1673, 1674, 1676, 1677, 1684, 1687, 1688, 1689, 1690, 1691, 1692, 1693, 1694, 1739, 1923, 1923.1 1923.2, LCV3405, PCV1401A, SDV3206, and tcv-4702-2):
    - i. Inconsistent tag numbers
    - ii. Inconsistent leak definitions for the same tag
    - iii. Inconsistent equipment classifications for the same tag number
    - iv. Tags labeled "N/A"
    - v. Tags that exist only for a few months
    - vi. Equipment with the same tag numbers
    - vii. Incorrect dating for inspection results
    - viii. Identical entries for two months
    - ix. Inconsistent descriptions for the same tag number
  - e. MarkWest Liberty Bulestone failed to re-monitor pressure relief devices (tags 80 and PSV3402) within five days of a release to confirm a condition of no detectable emissions in accordance with the methods specified in 40 C.F.R. § 60.485(c), which is required by 40 C.F.R. § 60.482-4(b)(2), as referenced in 40 C.F.R. § 60.632(a).

- f. MarkWest Liberty Bluestone failed to repair leaking equipment (tags 1764, 3402C, FCV5701B, PCV4302D, 1431, 1449 and 1498) within fifteen days of a leak unless it is eligible for designation as "delay of repair", which is required by 40 C.F.R. § 60.482-8(c), as referenced by 40 C.F.R. § 60.632(a).
  - g. MarkWest Liberty Bluestone failed to keep "repair delayed" records for equipment (tags 0078, 80, 233 and 2011) that had not been repaired within fifteen days in accordance with the requirements of 40 C.F.R. § 60.635(b)(2)(v)-(ix).
- 2. Failure to Submit LDAR Semi-Annual Reports:
  - a. MarkWest Liberty Bluestone failed to submit an LDAR semi-annual report to the Administrator for the months of October 2011 through March 2012, which is required by 40 C.F.R. §§ 60.636 and 60.487(a), as referenced by 40 C.F.R. § 60.632(e).
- 3. Failure to Keep Records:
  - a. From October 19, 2011 until July 25, 2012, MarkWest Liberty Bluestone failed to keep LDAR monitoring records, which are required by 40 C.F.R. §§ 60.635 and 60.486, as referenced by 40 C.F.R. § 60.632(e).
- 4. Failure to Operate a Vapor Recovery System and Control Device to Reduce VOC Emissions by 95% or 20 ppm:
  - a. MarkWest Liberty Bluestone failed operate a vapor recovery system for the JATCO BTEX Eliminator that recovers VOC emissions with an efficiency of 95% or greater or to an exit concentration of 20 ppm, whichever is less stringent, which is required by 40 C.F.R. § 60.482-10(b), as referenced by 40 C.F.R. § 60.632(a).
- 5. Failure to Include a Flare as an Emission Source on the Permit Application
  - a. MarkWest Liberty Bluestone failed to identify its TCI 4000 Incinerator (a flare) as an emission source in the Plan Approval Application for the Sarsen Gas Processing Plant, as required by Section 127.12(a)(2) of the Pennsylvania Code. The Plan Approval Application states that the JATCO BTEX Eliminator would be routed to the re-boiler, but non-condensable vapors are actually routed to the flare, making it an emission source.